

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

FILED BY *who* D.C.

05 MAY -3 PM 4:53

ROBERT R. DI TOLIO
CLERK, U.S. DIST. CT.
W.D. OF TN, MEMPHIS**JOSE OSCAR CHAVEZ, et al.,****Plaintiffs,****v.****NICOLAS CARRANZA,****Defendant.**

)

)

)

)

)

)

)

)

)

No. 03-2932 M1/P**JURY TRIAL****JUDGE McCALLA****MAGISTRATE JUDGE PHAM**

**STIPULATION AND AGREED ORDER TO CONTINUE TRIAL DATE
AND AMEND PRE-TRIAL SCHEDULE**

Due to a family emergency encountered by Defendant's counsel and after consultation with the Court's Case Manager, the parties, by and through counsel, stipulate and respectfully request that the Court continue the trial date and all pre-trial deadlines for a period of six weeks. A six-week continuance will alter the existing discovery schedule, as agreed to by the parties, as follows:

Event	Prior Deadline	Revised Deadline
Complete Requests for Admissions	May 13, 2005	June 24, 2005
Expert Depositions	April 15, 2005	May 27, 2005
Filing Dispositive Motions	May 13, 2005	June 24, 2005
Depositions for Proof	July 1, 2005	August 12, 2005
Joint Pretrial Order and Proposed Jury Instructions and Voir Dire Questions	August 23, 2005 No later than 5:00 p.m. 4:30	October 4, 2005 No later than 5:00 p.m. 4:30
Pretrial Conference	September 6, 2005 9:00 a.m.	October 18, 2005 9:00 a.m.
Jury Trial Set to Begin	September 19, 2005	October 31, 2005

Dated: April 26, 2005

Respectfully Submitted,

Robert M. Fargarson *w/ permission by Jeph*
Robert M. Fargarson, Esq.
FARGARSON & BROOKE
65 Union Avenue, 9th Floor
Memphis, TN 38103

Counsel for Defendant Nicolas Carranza

David R. Esquivel *w/ permission by Jeph*
David R. Esquivel (#21459)
BASS, BERRY & SIMS PLC
AmSouth Center
315 Deaderick Street, Suite 2700
Nashville, TN 37238-3001
Tel. (615) 742-6200
Fax (615) 742-2744

Matthew J. Eisenbrandt (CA Bar No. 217335)
CENTER FOR JUSTICE &
ACCOUNTABILITY
870 Market Street, Suite 684
San Francisco, CA 94102
Tel: (415) 544-0444
Fax: (415) 544-0456

Carolyn Patty Blum (MA Bar No. 046880)
CENTER FOR JUSTICE &
ACCOUNTABILITY
291 West 12th Street
New York, NY 10014
Tel: (212) 989-0012
Fax: (415) 544-0456

Counsel for Plaintiffs

ORDER

IT IS SO ORDERED, this 2 day of May 2005. The trial date
and pre-trial deadlines shall be continued for six weeks in accord with this schedule.

Jon P. McCalla
HON. JON P. McCALLA
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has this day been served upon the following counsel for the Defendant by depositing a copy thereof in the United States Mail, postage prepaid, this 26th day of April, 2005.

Robert M. Fargarson, Esq.
Fargarson & Brooke
65 Union Avenue, 9th Floor
Memphis, TN 38103

Counsel for Defendant Nicolas Carranza





Notice of Distribution

This notice confirms a copy of the document docketed as number 29 in case 2:03-CV-02932 was distributed by fax, mail, or direct printing on May 5, 2005 to the parties listed.

Matthew J. Eisenbrandt
CENTER FOR JUSTICE & ACCOUNTABILITY
870 Market St.
Ste. 684
San Francisco, CA 94102

Carolyn Patty Blum
CENTER FOR JUSTICE & ACCOUNTABILITY
291 West 12th St.
New York, NY 10014

Nicolas Carranza
6530 Red Birch Dr.
Memphis, TN 38115

Robert M. Fargarson
NEELY GREEN FARGARSON BROOKE & SUMMERS
65 Union Ave.
Ste. 900
Memphis, TN 38103--054

David R. Esquivel
BASS BERRY & SIMS PLC
315 Deaderick Street
Ste. 2700
Nashville, TN 37238--000

Honorable Jon McCalla
US DISTRICT COURT